From: Rafael Casanova
To: Gary Moore
Subject: Re: Pipeline
Date: 04/27/2007 01:22 PM

Gary, yes, I agree. Thanks.

Rafael Abrego Casanova, P.G. (Remedial Project Manager, Environmental Scientist)
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Assigned Sites for Investigation and Remediation
(http://www.epa.gov/earth1r6/6sf/6sf-tx.htm):
Brine Service Company Superfund Site (Corpus Christi, Texas)
Falcon Refinery Superfund Site (Ingleside, Texas)
Many Diversified Interests, Inc. Superfund Site (Houston, Texas)

▼ Gary Moore/R6/USEPA/US

Gary Moore/R6/USEPA/US

04/27/2007 01:00 PM

To "Stephen Halasz" <SHalasz@kleinfelder.com>
cc Rafael Casanova/R6/USEPA/US@EPA, "Richard Bergner" <rbergner@rfblaw.net>
Subject Re: Pipeline

Stephen:

I am a little confused as to what you are going to be doing. This is my understanding:

The intent of this operations is to remove any material within the pipelines (except uncontaminated seawater). Our expectation is that the pipeline(s) be cut at a location near the old dock facility and at Sunray Road and a vacuum be placed on the line(s) to remove any contaminated liquids/product from the pipeline(s). We realize that the line(s) likely have holes in them due to corrosion. You may need to talk with your vacuum expert about the ability to effectively clear the line(s) when they have significant holes in them.

It may be the best thing to run the pipeline camera down the pipeline from the dock area to Sunray Road to see if there is any oily material in the line and what shape

the line(s) are in. Then have your vacuum expert propose a strategy for removing any contaminated liquids from the line. It may be that you will need to pull from both ends or that you may have to make another cut in the middle of the line segment and pull from both ends to get the material removed. I suggest that you talk with your vacuum expert on this issue.

Certainly, running the camera down the line will give you an indication of where the line is damaged and the appropriate strategy to employ and we think this is an excellent idea. In addition, it will also identify locations where material may have seeped out into the environment giving you locations to sample for contamination and subsequent cleanup.

Please let me know what you think after you talk with your vacuum expert(s).

Thanks

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04/27/2007 09:06 AM

To Rafael Casanova/R6/USEPA/US@EPA, Gary Moore/R6/USEPA/US@EPA
cc "Richard Bergner" <rbergner@rfblaw.net>
Subject Pipeline

We are scheduled to uncover and cut the pipelines near the former docking facility on May 7th, provided that Offshore Specialty Fabricators (OSF) provides access. We initially plan to excavate the ends of the lines to determine if they are plugged or not and see if there is any visible liquid in the lines.

If the excavation fills with seawater we plan to move the excavation away from the shore a distance of approximately 100 feet, at a location that provides minimal disturbance to OSF.

When we are able to look in the pipelines either at the ends near the shore or after we cut the pipelines, we will determine if there is any visible liquid. If there is any liquid we will contract a vacuum truck and remove as much as possible. In that case we will likely make another cut down by Sunray road to be able to pull a vacuum.

If the pipelines appear empty we may contract with a pipeline camera contractor to put a camera into the lines to show that there is no liquid in the pipelines. If we find liquid we will appropriately remove the liquid with a vacuum truck.

As you see final decisions will be made in the field.

In preparing the RI/FS work plan we are updating the waste disposal portion of the report and recognize that by the end of July we will still have approximately 500,000 gallons of waste in the tanks. Based on the initial estimate (6.8 million gallons) and assuming that the amount of rainfall and evaporation have offset one another and the current disposal rate (approximately 100,000 gallons per month) the liquid waste in the tanks will be completely removed by the end of the year.

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